

Project Name: Greenhouse Gas Reporting Tool (ARB-EPA)

OCIO Project #: N/A (current project #: 3900-32)

Department: Air Resources Board

Revision Date:

Concept Statement

Description

Brief description of the proposed project:

Incorporate ARB's greenhouse gas mandatory reporting data fields from ARB's revised reporting regulation into USEPA's federal reporting system by Q1 2012. The final product will be an online data reporting system that will meet the greenhouse gas data reporting needs of facilities subject to federal and state greenhouse gas reporting requirements.

Need Statement

High Level Functional Requirements:

The State's greenhouse gas (GHG) reporting requirements will be integrated into USEPA's online federal GHG reporting system. Functionality within the federal reporting system, including public access to selected data, security of confidential information, proscribed calculation methods, and automated Q/A checks, will be leveraged for the CA reporting program. Functionality specific to the CA program (i.e., data for estimating imported electricity use) will need to be incorporated into the federal tool to meet California's needs.

What is Driving This Need?

The CA Air Resources Board approved a GHG reporting regulation in December 2007. In October 2009, USEPA published the federal GHG reporting rule. The CA rule is being aligned with the federal rule; however, there are data elements needed by the CA program not contained in the federal rule. The project focuses on adding functionality to the federal tool to meet the CA reporting requirements, which includes supporting ARB's cap-and-trade (C&T) program.

Risk to the Organization if This Work is Not Done:

The project consolidates the reporting of GHG data from facilities in CA through one online tool. If the project is not undertaken, CA would have a separate reporting system. It is likely different data for the same reporting facility would be transmitted to the Air Resources Board (ARB) and to USEPA. This confusion would create problems for other ARB climate change programs, including the proposed GHG C&T program. Additionally, the public would not be served by using limited resources to create a parallel reporting system.

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Benefit Statement

Intangible Benefits

Process Improvements (describe the nature of the process improvement):

Consolidation of GHG reporting through one online tool simplifies and streamlines the reporting process for those facilities subject to ARB's and USEPA's GHG reporting regulations.

Other Intangible Benefits:

Tangible Benefits

Revenue Generation (describe how revenue will be generated):

Data collected through a consolidated online reporting tool will provide information needed for ARB's AB 32 Cost of Fee Implementation Regulation, which assesses fees on GHG emitting facilities. The revenue generated by the Fee Regulation (est. in the millions) will be used to support the costs of carrying out AB 32.

Cost Savings (describe how cost will be reduced):

Integrating California's data collection process with USEPA's federal reporting tool will save costs by leveraging an existing federal online reporting system similarly designed for GHG data collection. The costs of adding State-specific data fields to the federal reporting system will be significantly less than maintaining a separate CA GHG reporting system.

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Cost Avoidance (describe the cost and how avoided):

Major hosting and M&O costs will be avoided since the CA reporting system will essentially piggyback on the federal reporting tool.


Risk Avoidance (describe the risk and how avoided):

Streamlining the GHG reporting process through a single reporting portal will reduce the potential of reporters transmitting different datasets to CA and USEPA. This will reduce the possibility of reporting error and reduce the risk of inaccurate data flowing to ARB's C&T and Fee Regulation programs.

Improved Services:

The project integrates mandatory GHG reporting for ARB and USEPA through one reporting tool thus easing the administrative burden on reporters by eliminating duplicative reporting by 500+ facilities/entities throughout the State. Reporters will save time and money and increase reporting efficiency by reporting data through one comprehensive tool that includes USEPA and ARB GHG data fields.

Consistency

"No" Responses 		Rationale	Action Required
Enterprise Architecture	Yes		
Business Plan	Yes		
Strategic Plan	Yes		

Impact to Other Entities

Nature of Impact to Other Entities

Entity: USEPA

Describe the nature of the impact:

ARB will effectively become USEPA's partner in collecting GHG data. ARB and USEPA are collaborating and it is anticipated that USEPA will provide the major design, development, and M&O support for the reporting tool. This project will add CA-specific data fields to the federal system.

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major design, development, and maintenance support for the reporting tool. This project will add GHG emissions data feeds to the Federal system.

Entity: CA State Agencies

Describe the nature of the impact:

Non-confidential data collected through the online GHG reporting system will be shared by ARB with other State agencies to support GHG emissions tracking and mitigation programs. State agencies include the California Energy Commission, Public Utilities Commission, and the California Department of Water Resources, among others.

Entity: Local Air Districts (APCDs/AQMDs)

Describe the nature of the impact:

Local air districts throughout California will be positively impacted. It is anticipated that GHG data from the system will be published periodically and will be accessible to the air districts. Air districts may use these GHG data to support local GHG mitigation programs.

Entity:

Describe the nature of the impact:

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Solution Alternatives

Alternative 1:

Incorporate ARB's revised greenhouse gas reporting regulation data fields into USEPA's federal greenhouse gas online reporting system by the first quarter of 2012.

Technical Considerations for Alternative 1:

ARB will work with USEPA's contractor to integrate data fields and other information specific to the ARB's revised mandatory reporting regulation into the USEPA system. ARB will leverage much of the design, development, and implementation of USEPA's reporting system which will lead to greater efficiency in reporting with reduced costs.

ROM Cost: \$500,000 to \$750,000

Note: high end of range must not exceed 200% of low end of range

Alternative 2:

ARB modifies current reporting tool to incorporate revised GHG reporting requirements.

Technical Considerations for Alternative 2:

Alternative 2 would require substantial software development since the ARB's current reporting tool is based on the existing regulation. The revised regulation captures additional and more specific GHG data (most of these data are already included in USEPA's tool). A greater number of reporting sources may require additional hardware and software capacity/performance.

ROM Cost: \$500,000 to \$1,000,000

Note: high end of range must not exceed 200% of low end of range

Alternative 3:

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Technical Considerations for Alternative 3:

ROM Cost: to

Note: high end of range must not exceed 200% of low end of range

Recommendation

Comparison:

Alternative 1	ROM Cost			Risk
ARB-USEPA Reporting Tool Integration	\$500,000	-	\$750,000	<i>Lack of full USEPA commitment; availability of resources; political</i>
Alternative 2	ROM Cost			Risk
ARB Reporting Tool Revision	\$500,000	-	\$1,000,000	<i>Availability of resources; time constraints; political uncertainty</i>
Alternative 3	ROM Cost			Risk
	\$0	-	\$0	

Conclusions:

1	Integrating ARB's GHG reporting requirements into USEPA's reporting system will streamline reporting, increase efficiency, and reduce errors.
2	Revising the current ARB reporting system will increase development costs and could involve significant time delays.
3	
4	

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Recommendation:

Alternative 1 is recommended.

Project Approach *(if known)*

System Complexity:		System Business Hours: <i>(e.g., 24x7, 9am-5pm)</i> :			
Architecture	<input type="checkbox"/> Mainframe <input type="checkbox"/> Client Server <input type="checkbox"/> Web Based			Num. of New Databases:	
Technology	<input type="checkbox"/> New <input type="checkbox"/> New to Staff <input type="checkbox"/> In-House Experience			Interfaces:	
Implementation	<input type="checkbox"/> Central Site <input type="checkbox"/> Phased Roll-out			Num. of Sites:	
M & O Support	<input type="checkbox"/> Contractor <input type="checkbox"/> Data Center <input type="checkbox"/> Project <input type="checkbox"/> In House				
Procurement Approach:				Number of Procurements:	
Open Procurement?		Delegated Procurement?			
Scope of Contract	<input type="checkbox"/> Development <input type="checkbox"/> Implementation <input type="checkbox"/> M & O <input type="checkbox"/> Other: _____				
Anticipated Length of Contract:		Years / _____ extensions for _____ years			